## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA, Plaintiff,

INFORMATION

RECEIVED AND FILED CLERK'S OFFICE U.S. DISTRICT COURT SAN JUAN, P.R. 2025.07.09 13:02:00 -04'00'

CRIMINAL NO. 25-312 (RAM)

18 U.S.C. § 641

TWO COUNTS

V.

FRANCISCO RAMOS-DOMINGUEZ, Defendant.

THE UNITED STATES ATTORNEY CHARGES:

#### **COUNT ONE**

Theft of Government Property (18 U.S.C. § 641)

From on or about July 17, 2020, through on or about July 21, 2020, in the District of Puerto Rico, the defendant,

### FRANCISCO RAMOS-DOMINGUEZ,

knowingly and willfully embezzled, stole, and converted to his own use or the use of another, money of the United States, namely Small Business Administration COVID-19 Economic Injury Disaster Loan payments to which he knew he was not entitled, having a value over the amount of \$1,000.00, that is, approximately \$150,000.00. In violation of 18 U.S.C. § 641.

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#### **COUNT TWO**

# Theft of Government Property (18 U.S.C. § 641)

Between on or about May 1. 2021, through on or about February 28, 2022, in the District of Puerto Rico, the defendant,

#### FRANCISCO RAMOS-DOMINGUEZ,

knowingly and willfully embezzled, stole, and converted to her own use or the use of another, money of the United States, namely COVID-19 Economic Impact Payments under the Cares Act to which he knew he was not entitled, having a value over the amount of \$1,000.00, that is, approximately \$111,800.00. In violation of 18 U.S.C. § 641.

#### FORFEITURE ALLEGATION

Upon conviction of the offense in violation of 18 U.S.C. § 641, charged in Counts One and Two of this Information, the defendant, **FRANCISCO RAMOS-DOMINGUEZ**, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, that constitutes, or is derived from, proceeds traceable to the commission of the offense, including but not limited to approximately \$261,800.00 in United States currency.

If any of the property described in paragraph 1 hereof as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of this Court;



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- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of substitute property. All pursuant to 18 U.S.C. § 981 and 28 U.S.C. § 2461(c).

W. STEPHEN MULDROW United States Attorney

Seth A. Erbe

Assistant United States Attorney

Chief Financial Fraud and Public Corruption

Unit

Vanessa D. Bonano-Rodríguez

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